

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

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STAR AUTO SALES OF BAYSIDE, INC. (d/b/a
STAR TOYOTA OF BAYSIDE), STAR AUTO
SALES OF QUEENS, LLC (d/b/a STAR
SUBARU), STAR HYUNDAI LLC (d/b/a STAR
HYUNDAI), STAR NISSAN, INC. (d/b/a STAR
NISSAN), METRO CHRYSLER PLYMOUTH
INC. (d/b/a STAR CHRYSLER JEEP DODGE),
STAR AUTO SALES OF QUEENS COUNTY
LLC (d/b/a STAR FIAT), and STAR AUTO
SALES OF QUEENS VILLAGE LLC (d/b/a STAR:
MITSUBISHI),

Plaintiffs,

v.

VOYNOW, BAYARD, WHYTE AND
COMPANY, LLP, HUGH WHYTE, RANDALL
FRANZEN, and ROBERT SEIBEL,

Defendants.

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Jamie S. Felsen, Esq. declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that
the following is true and correct:

1. I am admitted to practice before this Court and am a member of Milman Labuda
Law Group PLLC, attorneys for the Plaintiffs in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein
based upon my personal knowledge and a review of the file maintained by this office.

3. I submit this declaration on behalf of Plaintiffs in opposition to non-party, Steven
McCloskey's, motion to quash a subpoena for his deposition.

4. David Kumor, a Voynow employee until his recent resignation, testified that Defendant Voynow Bayard Whyte & Company, LLP (“Voynow”) performed more than tax work for Thompson Auto Group, a dealership group that he performed services for while he was employed by Voynow. **(Annexed as Exhibit A is a copy of the relevant portion of David Kumor’s deposition).**

5. I respectfully request that this Court deny Mr. McCloskey’s motion to quash the subpoena.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 15, 2023.

/s/ Jamie S. Felsen